

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FULL CIRCLE UNITED, LLC,

Plaintiff,

v.

BAY TEK ENTERTAINMENT, INC.,

Defendant.

BAY TEK ENTERTAINMENT, INC.,

Counterclaim Plaintiff,

v.

FULL CIRCLE UNITED, LLC,

Counterclaim Defendant,

and

ERIC PAVONY,

Additional Counterclaim
Defendant.

CASE NO. 1:20-CV-03395-BMC

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION IN LIMINE TO EXCLUDE ARGUMENT
AND EVIDENCE TO THE EXTENT OFFERED TO RE-LITIGATE
ISSUES ESTABLISHED AS A MATTER OF LAW**

PLEASE TAKE NOTICE that pursuant to Rules 401, 402, and 403 of the Federal Rules of Evidence and upon the accompanying Memorandum of Law and the Declaration of Mark C. Humphrey dated February 28, 2025 and exhibits appended thereto, and all prior pleadings and proceedings herein, Defendant and Counterclaim Plaintiff Bay Tek Entertainment, Inc. hereby

moves this Court to exclude arguments and evidence proffered by Plaintiff and Counterclaim Defendant Full Circle United, LLC that re-litigates issues established as a matter of law by this Court, and for such other further relief as the Court may deem just and proper.

DATED: New York, New York
February 28, 2025

Respectfully submitted,
Mitchell Silberberg & Knupp LLP

By: /s/ Mark C. Humphrey
Christine Lepera (CL 9311)
Andrew Nietes
437 Madison Ave., 25th Floor
New York, New York 10022-7001
Telephone: (212) 509-3900
Facsimile: (212) 509-7239
Email: ctl@msk.com
Email: afn@msk.com

Mark C. Humphrey (*pro hac vice*)
James Berkley (*pro hac vice*)
2049 Century Park East, 18th Floor
Los Angeles, California 90067-3120
Telephone: (310) 312-2000
Facsimile: (310) 312-3100
Email: mxh@msk.com
Email: jdb@msk.com

Attorneys for Bay Tek Entertainment, Inc.